

AFFIDAVIT

I, Caitlin Moynihan, having been duly sworn, do depose and say as follows:

1. I am a Special Agent with Homeland Security Investigations (HSI). HSI is a directorate within Immigration and Customs Enforcement (ICE). ICE is a subordinate component of the Department of Homeland Security (DHS) and the successor to many of the law enforcement powers of the former Immigration and Naturalization Service and the former U.S. Customs Service. I have been a Special Agent since October 2009. I graduated from the Federal Law Enforcement Training Center in April 2010. I am currently assigned to the Burlington, Vermont Resident Agent in Charge Office. I hold a Bachelor of Arts degree in sociology from Providence College. Throughout my time with HSI, I have gained experience, through training and everyday work, in investigating violations relating to child exploitation and child pornography, including the advertising, production, receipt, transportation, possession, and distribution of child pornography, in violation of 18 U.S.C. §§ 2251 and 2252.

2. This Affidavit is offered to demonstrate that probable cause exists to believe that SEAN GUILLETTE, of Burlington, Vermont, knowingly possessed at least one matter which contains any visual depiction that had been shipped or transported using any means or facility of interstate commerce, or which were produced using materials which have been so shipped or transported, including by computer, the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct, and such visual depiction is of such conduct, in violation of 18 U.S.C. § 2252(a)(4)(B).

3. I have not set forth all facts I know from my investigation into this matter. Rather, I have only included those facts I believe establish probable cause to believe that SEAN GUILLETTE committed the foregoing offense. My knowledge comes from my review of

Burlington Police Department (BPD) Detective Corporal Tom Chenette's affidavit and from my conversation with Det. Chenette.

PROBABLE CAUSE

4. On May 3, 2019, BPD Det. Chenette swore to an affidavit in Chittenden County, Vermont charging SEAN GUILLETTE with state violations of possession of child pornography. On June 17, 2019, I spoke with Det. Chenette about his affidavit. He confirmed to me that his affidavit remains factually accurate. A true and correct copy of Det. Chenette's affidavit is attached hereto as Exhibit 1 and incorporated herein in its entirety.

5. As detailed in Detective Chenette's affidavit, the following occurred on April 11, 2019:

a. SEAN GUILLETTE was the subject of a domestic assault investigation in Burlington, Vermont.

b. Responding Burlington Police Department (BPD) officers spoke with the woman involved in the alleged domestic assault, who stated that she had observed GUILLETTE viewing child pornography on his cell phone.

c. The reporting woman said that GUILLETTE's cell phone was in her vehicle, and identified it. BPD seized the cell phone. The phone was a gray Samsung cell phone, model # SM-J327A, serial # R28J42ALB4E (hereafter Samsung Cell Phone).

d. Det. Chenette applied for a search warrant to search the Samsung Cell Phone belonging to GUILLETTE, which was granted by the Honorable Judge Carlson of the Chittenden Superior Court. On April 27, 2019, Det. Chenette executed the search warrant on the Samsung Cell Phone. The Cellebrite extraction and manual examination of the Samsung Cell Phone resulted in the discovery of a number of files showing that GUILLETTE was a user of the

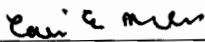
Samsung Cell Phone (Exhibit 1, ¶ 11). The examination and extraction also resulted in discovery of a video file and numerous still images containing sexually explicit depictions of minors. Det. Chenette viewed the images and video and described his observations in Exhibit 1, ¶¶ 10, 11-15.

1. I have reviewed the description of these files in Exhibit 1. Based on my training and experience, I believe that child pornography, as that term is defined in 18 U.S.C. § 2256, was found on the Samsung Cell Phone.

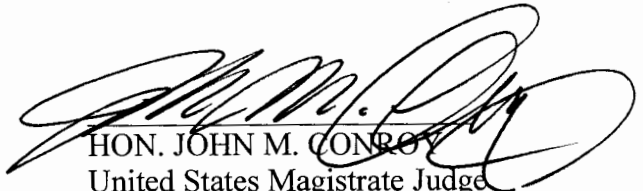
6. On May 3, 2019, GUILLETTE was arrested by Det. Chenette for state child pornography violations.

7. The Samsung Cell Phone was manufactured in China.

8. Based on the foregoing, I believe there is probable cause to believe that SEAN GUILLETTE knowingly possessed child pornography, in violation of 18 U.S.C. § 2252(a)(4)(B).


CAITLIN MOYNIHAN
Special Agent
Homeland Security Investigations

Subscribed and sworn to before me this 17th day of June, 2019.


HON. JOHN M. CONROY
United States Magistrate Judge